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Attorneys for Defendant
AMERICAN SEAFOOD EXP, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRAND LITTLE and ROBIN BURNS, Individually
and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

PACIFIC SEAFOOD PROCUREMENT, LLC;
PACIFIC SEAFOOD PROCESSING, LLC;
PACIFIC SEAFOOD FLEET, LLC; PACIFIC
SEAFOOD DISTRIBUTION, LLC; PACIFIC
SEAFOOD USA, LLC; DULCICH, INC.; PACIFIC
SEAFOOD – EUREKA, LLC; PACIFIC
SEAFOOD – CHARLESTON, LLC; PACIFIC
SEAFOOD – WARREN-TON, LLC; PACIFIC
SEAFOOD – NEWPORT, LLC; PACIFIC
SEAFOOD – BROOK-INGS, LLC; PACIFIC
SEAFOOD – WESTPORT, LLC; PACIFIC
SURIMI – NEWPORT LLC; BLUE RIVER
SEAFOOD, INC.; SAFE COAST SEAFOODS,
LLC; SAFE COAST SEAFOODS WASHINGTON,
LLC; OCEAN GOLD SEAFOODS, INC.; NOR-
CAL SEAFOOD, INC.; KEVIN LEE; AMERICAN
SEAFOOD EXP, INC.; CALIFORNIA
SHELLFISH COMPANY, INC.; ROBERT
BUGATTO ENTERPRISES, INC.; ALASKA ICE
SEAFOODS, INC.; LONG FISHERIES, INC.;
CAITO FISHERIES, INC.; CAITO FISHERIES,
LLC; SOUTH-WIND FOODS, LLC;
FISHERMEN’S CATCH, INC.; GLOBAL
QUALITY FOODS, INC.; GLOBAL QUALITY
SEAFOOD LLC; OCEAN KING FISH INC.;
SOUTH BEND PRODUCTS LLC; SWANES
SEAFOOD HOLDING COMPANY LLC; BORN-
STEIN SEAFOODS, INC.; ASTORIA PACIFIC
SEAFOODS, LLC; and DOES 30-60,

Defendants.

Case No. 3:23-cv-01098-AGT

**STIPULATION TO EXTEND TIME
FOR DEFENDANT AMERICAN
SEAFOOD EXP, INC. TO RESPOND
TO SECOND AMENDED
COMPLAINT [L.R. 6-1]**

Complaint filed: March 13, 2023
Amended Complaint: August 21, 2024
2nd Amended Complaint: February 7, 2025
Trial: Not Yet Set

1 WHEREAS, Plaintiff Brand Little and Robin Burns (collectively, “Plaintiffs”) filed their
2 operative Second Amended Class Action Complaint (the “Complaint”) on February 7, 2025;

3 WHEREAS, the deadline for Defendant American Seafood Exp, Inc. (“American Seafood”)
4 to respond to the Complaint was February 21, 2025;

5 WHEREAS, American Seafood has requested a short extension, given the robustness of the
6 Complaint and scheduling conflicts;

7 WHEREAS, Plaintiffs have agreed to extend the deadline of American Seafood to respond to
8 the Complaint by one week, *i.e.*, until February 28, 2025;

9 WHEREAS, in accordance with Local Rule 6-1, this extension will not affect the date of any
10 event or deadline already fixed by Court order;

11 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:
12 The deadline for American Seafood to respond to Plaintiffs’ Complaint shall be extended to February
13 28, 2025.

14 SO STIPULATED.

15 Respectfully submitted,

16 DATED: February 24, 2025

KENNEDYS CMK LLP

18 By: /s/ Jonathan W. Thames

JONATHAN W. THAMES

Attorneys for Defendant

AMERICAN SEAFOOD EXP, INC.

23 Respectfully submitted,

24 DATED: February 24, 2025

GROSS KLEIN PC

26 By: /s/ Stuart G. Gross

STUART G. GROSS

Attorneys for Plaintiffs and the Proposed
Classes

LOCAL RULE 5-1 ATTESTATION

I, Jonathan W. Thames, am the ECF user whose ID and password are being used to file this STIPULATION TO EXTEND TIME FOR DEFENDANT AMERICAN SEAFOOD EXP, INC. TO RESPOND TO SECOND AMENDED COMPLAINT [L.R. 6-1]. In compliance with Civil Local Rule 5-1, I hereby attest that Stuart G. Gross concurs in and has authorized this filing.

DATED: February 24, 2025

KENNEDYS CMK LLP

By: /s/ Jonathan W. Thames

JONATHAN W. THAMES

Attorneys for Defendant

AMERICAN SEAFOOD EXP, INC.